

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION,

Case No. 19-md-02913-WHO

**JOINT STIPULATION TO EXTEND
DEADLINES TO FILE AMENDED
COMPLAINTS FOR OPT-OUT
PLAINTIFFS**

This Document Relates to:

Cole Aragona v. JUUL LABS, INC., et al.
Jordan Dupree v. JUUL LABS, INC., et al.
Kaitlyn Fay v. JUUL LABS, INC., et al.
Jennifer Lane v. JUUL LABS, INC., et al.
Bailey Legacki v. JUUL LABS, INC., et al.
Walker McKnight v. JUUL LABS, INC., et al.
Ashlynn Nessmith v. JUUL LABS, INC., et al.
Carson Sedgwick v. JUUL LABS, INC., et al.
Ben Shapiro v. JUUL LABS, INC., et al.
Matthew Tortorici v. JUUL LABS, INC., et al.

Pursuant to Section VIII.B of this Court’s Case Management Order Nos. 17 and 19, this Court’s May 31, 2024 Minute Order, the ten (10) personal injury plaintiffs who have elected to opt-out from Plaintiffs’ settlements with JLI and/or Altria (the “Schlesinger opt-outs”), Defendant Juul Labs, Inc. (“JLI”), the JLI Settling Defendants¹, the independent retailer Defendants², and Defendants Altria Group, Inc., Philip Morris USA, Inc., Altria Client Services LLC, Altria Enterprises LLC, and Altria Group Distribution Company (“Altria”), (collectively referred to herein as the “Parties”) respectfully submit this joint proposed Scheduling Order for the Opt-Out Plaintiffs.

The Parties have met and conferred and agreed to extend the deadline to file long-form

¹ Specifically the JLI Settling Defendants include: JUUL LABS, INC., previously d/b/a PAX LABS, INC. and PLOOM INC.; JAMES MONSEES; ADAM BOWEN; NICHOLAS PRITZKER; HOYOUNG HUH; RIAZ VALANI; MOTHER MURPHY’S LABS, INC.; ALTERNATIVE INGREDIENTS, INC.; TOBACCO TECHNOLOGY, INC.; eLIQUITECH, INC.; MCLANE COMPANY, INC.; EBY-BROWN COMPANY, LLC; CORE-MARK HOLDING COMPANY, INC.; CHEVRON CORPORATION; CIRCLE K STORES INC.; SPEEDWAY LLC; 7-ELEVEN, INC.; WALMART; WALGREENS BOOTS ALLIANCE, INC.

² Specifically the independent retailer Defendants include: MEGA SELECT, INC. d/b/a THE HOOK UP and XMMS LLC D/B/A CLIMAX SMOKE SHOP OR CLIMAX.

1 complaints for the above-referenced Opt-Out Plaintiffs in light of the fact that counsel for the
2 above-captioned Opt-Out Plaintiffs was in trial the first week of June 2024 and is preparing for a
3 trial that is scheduled July 9, 2024 until July 19, 2024. The Parties have agreed to extend the
4 deadline to file long-form complaints to July 29, 2024 in the following matters: *Cole Aragona v.*
5 *JUUL LABS, INC., et al.*; *Jordan Dupree v. JUUL LABS, INC., et al.*; *Kaitlyn Fay v. JUUL LABS,*
6 *INC., et al.*; *Jennifer Lane v. JUUL LABS, INC., et al.*; *Bailey Legacki v. JUUL LABS, INC., et al.*;
7 *Ashlynn Nessmith v. JUUL LABS, INC., et al.*; *Carson Sedgwick v. JUUL LABS, INC., et al.*; *Ben*
8 *Shapiro v. JUUL LABS, INC., et al.*; and *Matthew Tortorici v. JUUL LABS, INC., et al.* and hereby
9 submit the submit the proposed Scheduling Order pursuant to the deadlines provided by this Court's
10 May 31, 2024 Minute Order, attached hereto as **Exhibit 1**.

11 The Parties have agreed to extend the deadline to file a long-form complaint to July 11,
12 2024 in the matter of *Walker McKnight v. JUUL LABS, INC., et al.* and hereby submit the submit
13 the proposed Scheduling Order pursuant to the deadlines provided by this Court's May 31, 2024
14 Minute Order, attached hereto as **Exhibit 2**.

15 The Parties have further agreed that, at this time, no other deadlines for Additional
16 Discovery or *Daubert* or dispositive motions will move as a result of this extension, and hereby
17 submit the proposed Scheduling Order pursuant to the deadlines provided by this Court's May 31,
18 2024 Minute Order, attached hereto as Exhibits 1 and 2.³

27 ³ The Parties submit that they will file this stipulation and the appropriate scheduling order
28 (Exhibit 1 for all Opt-Out Plaintiffs other than Walker McKnight, 3:20-cv-2600 and Exhibit 2 for
Walker McKnight only) in the underlying, individual cases.

1 Dated: July 8, 2024

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